

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

|                       |   |                                       |
|-----------------------|---|---------------------------------------|
| DOUGLAS W. BAILLIE    | ) | Case No. 1:02cv062                    |
|                       | ) |                                       |
| Plaintiff,            | ) | (Judge Spiegel)                       |
|                       | ) |                                       |
| -v-                   | ) | <u>DEFENDANT'S UNOPPOSED MOTION</u>   |
|                       | ) | <u>FOR EXTENSION OF THE FILING</u>    |
| CHUBB & SON INSURANCE | ) | <u>DEADLINE FOR DEFENDANT'S REPLY</u> |
|                       | ) | <u>MEMORANDUM IN SUPPORT OF</u>       |
| Defendant.            | ) | <u>DEFENDANT'S MOTION FOR</u>         |
|                       | ) | <u>SUMMARY JUDGMENT</u>               |

Comes now Defendant Chubb & Son Insurance, by and through counsel, and moves this Court to extend the filing deadline for Defendant's Reply Memorandum in Support of Defendant's Motion for Summary Judgment. Specifically, the Defendant seeks an extension from the current deadline of November 6, 2003 to November 10, 2003. This is the first request for such an extension of time and is proposed due to Defendant's counsel's travel schedule. Counsel for Plaintiff has been contacted and has indicated that he has no objection to the requested extension.

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Respectfully submitted,

s/ David K. Montgomery  
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#### **CERTIFICATE OF SERVICE**

I hereby certify that on October 29, 2003, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: Randolph H. Freking and Mark W. Napier, Attorneys for the Plaintiff.

s/ David K. Montgomery  
David K. Montgomery